

JUDGE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,)	No. CR19-159RSL
)	
Plaintiff,)	
)	UNOPPOSED DEFENSE MOTION TO
v.)	EXTEND RULE 29, RULE 33, AND
)	RULE 34 DUE DATES
PAIGE THOMPSON,)	
)	
Defendant.)	

The defendant, Paige Thompson, through her attorneys, respectfully request an additional extension of the Rule 29(c)(1), Rule 33(b), and Rule 34 motion due dates to August 3, 2022, with a Response due August 24, 2022 and Reply due September 2, 2022. The parties also request that the Sentencing date be continued to March 28, 2022. The request for an additional extension is unopposed by the Government as represented by Assistant United States Attorneys Andrew Friedman, Jessica Manca and Tania Culbertson.

1) A Guilty Jury Verdict was returned on Ms. Thompson on June 17, 2022. [Dkt. 331].

2) Rule 29(c)(1), Rule 33(b)(2), and Rule 34(b) Motions must be filed within 14 days after the verdict or finding of guilty, which would be July 1, 2022.

3) An extension of the motions due date is sought because the trial transcripts have not been finalized yet and defense counsel needs to review the transcripts to effectively prepare the post-trial motions.

1 4) The parties agree the proposed timeline is sufficient while also
2 considering other case briefing deadlines and/or holiday schedules.

3 For these reasons, the defense requests the Court to order that:

4 The Rule 29, Rule 33, and Rule 34 motions due date be extended to August 3,
5 2022, Government Response due August 24, 2022, Defense Reply due September 2,
6 2022.

7 DATED this 22nd day of June, 2022.

8 Respectfully submitted,

9 /s/ *Mohammad Ali Hamoudi*
10 MOHAMMAD ALI HAMOUDI

11 /s/ *Christopher Sanders*
12 CHRISTOPHER SANDERS

13 /s/ *Nancy Tenney*
14 NANCY TENNEY
15 Assistant Federal Public Defenders

16 /s/ *Brian Klein*
17 BRIAN KLEIN

18 /s/ *Melissa Meister*
19 MELISSA MEISTER
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21 Attorneys for Paige Thompson
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